

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jonathan Stalling

Case: 2:23-mj-30446

Assigned To : Unassigned

Assign. Date : 11/3/2023

CMP: SEALED MATTER (MAW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

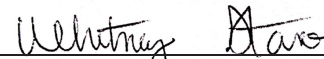
On or about the date(s) of August 9, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. §§ 2252A(a)(5)(B)

Possession of and/or access with intent to view child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: November 3, 2023City and state: Detroit, MI
  
 Complaintant's signature

 Whitney Staso, Special Agent, FBI  
 Printed name and title

  
 Judge's signature

 Hon. Elizabeth A. Stafford, U.S. Magistrate Judge  
 Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION  
FOR A COMPLAINT AND ARREST WARRANT**

I, Whitney Staso, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since 2015. I am currently assigned to the Detroit Field Office, Macomb County Resident Agency. As part of my official duties, I investigate crimes involving the sexual exploitation of minors, including criminal offenses pertaining to online enticement and the illegal production, distribution, receipt, and possession of child pornography. I have received training in the proper investigative techniques for violations pertaining to child pornography and child exploitation. I have conducted and assisted in child exploitation investigations, to include undercover operations to identify and locate individuals who seek to engage in sexual activity with minors, and have executed search warrants that have led to seizures of child pornography. I have also received training in computer systems, computer networks, and mobile devices. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2252A(a)(5)(B), and I am authorized by law to request a complaint and arrest warrant.

2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Jonathon Stalling (DOB XX/XX/1977), a

registered sex offender, for violations of 18 U.S.C. §§ 2252A(a)(5)(B) – possession of and/or access with intent to view child pornography.

3. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents and state and local law enforcement officers; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcements officers; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish that Jonathon Stalling has violated 18 U.S.C. §§ 2252A(a)(5)(B).

### **BACKGROUND OF INVESTIGATION**

4. On December 14, 2020, Stalling pleaded guilty to one count of receipt of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2) in the Eastern District of Michigan. On May 14, 2021, Stalling was sentenced to sixty months of imprisonment followed by five years of supervised release.

5. Stalling began supervised release on June 5, 2023. On August 30, 2023, Stalling's probation officer received notification from internet monitoring software that there had been a credible hit for child sexual abuse material (CSAM) from Stalling's phone. The probation officer questioned Stalling about viewing the material. Stalling admitted to viewing CSAM by placing an SD card in his phone. Stalling reported that he thought the SD card contained music and destroyed the card the same day.

6. One of the conditions of Stalling's supervised release is that he is not allowed to leave the Eastern District of Michigan without first getting permission from the court or the probation officer. Stalling did not ask for permission to leave the district on August 9, 2023.

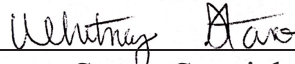
7. On October 10, 2023, I received a copy of the images from the probation department's internet monitoring software. Stalling viewed the images from approximately 8:30 am through 12:00 pm on August 9, 2023. During this time, Stalling viewed approximately 90 images of CSAM. In one of the images, a prepubescent male is performing oral sex on another male. In multiple images, the prepubescent male's face and genital are both visible. I believe these images meet the federal definition of child pornography.

8. Stalling is a registered sex offender from the previous conviction in 2020. Stalling faces increased penalties for violations of 18 U.S.C. §§ 2252A.

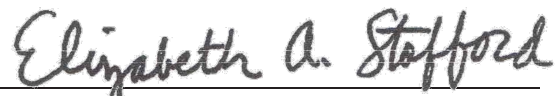
## CONCLUSION

9. Based on the foregoing, there is probable cause to believe Jonathan Stalling possessed with intent to view child pornography, in violation of 18 U.S.C. §§ 2252A(a)(5)(B) on August 9, 2023 in the Eastern District of Michigan.

Respectfully submitted,

  
\_\_\_\_\_  
Whitney Staso, Special Agent  
Federal Bureau of Investigation

Sworn and subscribed in my presence  
and/or by reliable electronic means.

  
\_\_\_\_\_  
Hon. Elizabeth A. Stafford  
United States Magistrate Judge

Dated: November 3, 2023